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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERICA BLUTH, an individual, and
LAVORIA WILSON, an individual,

Plaintiff,

vs.

TYLER BAEHR, and individual, and THE
CITY OF RENO, a political subdivision of
the State of Nevada,

Defendants.

CASE NO.: 3:25-cv-00129-MMD-CSD

**CITY OF RENO’S MOTION FOR
LEAVE TO FILE A SUPPLEMENT IN
CLARIFICATION OF ITS MOTION
FOR JUDGMENT ON THE
PLEADINGS (ECF NO. 16)**

Defendant City of Reno (“the City”), by and through its attorneys, Reno City Attorney Karl S. Hall and Deputy City Attorney Peter Keegan, hereby moves for leave to file an supplement in clarification of its Motion for Judgment on the Pleadings (ECF No. 16). This Motion is based LR 7-2(g); the following Memorandum of Points and Authorities; and any additional information the Court may choose to consider.

MEMORANDUM OF POINTS AND AUTHORITES

The City originally filed its Motion for Judgment on the Pleadings (ECF No. 16) on April 30, 2025, which has been fully briefed.¹ During the Court’s June 18, 2025, hearing on Plaintiff’s

¹ See (ECF Nos. 16, 31, and 33).

1 Second Motion Regarding Discovery Dispute (ECF No. 45), Plaintiffs' counsel challenged that
 2 the City's Motion for Judgment on the Pleadings (ECF No. 16) represented that Defendant Baehr's
 3 conduct was limited to the two incidents alleged in Plaintiffs' Complaint (ECF No. 1). Upon
 4 questioning by Magistrate Judge Denny during the hearing, the undersigned counsel stated that the
 5 City's Motion (ECF No. 16) argued that the two incidents alleged in Plaintiffs' Complaint did not
 6 put the city on actual or constructive notice of a widespread pattern in relation to Plaintiff's *Monell*
 7 claim for insufficient training by the City. During the June 18, 2025, hearing, the undersigned
 8 counsel further represented that any argument that Defendant Baehr's conduct was limited only to
 9 the two incidents alleged by Plaintiffs would be withdrawn.

10 Upon review of the City's Motion (ECF No. 16) the undersigned counsel identified the
 11 following relevant argument: "Indeed, Plaintiff's Complaint only alleges the two incidents at issue
 12 where Defendant Baehr violated their Fourth Amendment rights, the first on December 31, 2023,
 13 and the second on August 12, 2024.^{2,3} After consideration, City does not believe that this
 14 argument represents that there were only two incidents. To avoid any ambiguity in its argument,
 15 however, counsel for the City humbly moves this Court for leave to file the proposed supplement
 16 attached hereto in redlined format as **Exhibit 1** and entitled City of Reno's Supplement to its
 17 Motion for Judgment on the Pleadings (ECF No. 16).

18 DATED this 27th day of June, 2025.

19 KARL S. HALL
 20 Reno City Attorney

21 By: /s/ Peter Keegan
 22 PETER K. KEEGAN
 23 Deputy City Attorney
 24 Nevada State Bar No. 12237
 25 Post Office Box 1900
 26 Reno, Nevada 89505
 27 *Attorneys for the City of Reno*

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² Complaint (ECF No. 1 at 3-4 ¶ 13, 19; 9 ¶ 51).
³ (ECF No. 16 at 14:19-21).

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the RENO CITY ATTORNEY'S OFFICE, and that on this date, I am serving the foregoing **MOTION FOR LEAVE TO FILE A SUPPLEMENT IN CLARIFICATION OF CITY OF RENO'S MOTION FOR JUDGMENT ON THE PLEADINGS (ECF NO. 16)** on the party(s) set forth below by:

 X CMECF electronic service.

Electronically addressed as follows:

Luke Busby, Esq.
316 California Ave.
Reno, NV 89509
luke@lukeandrewbusbyltd.com
Attorney for Plaintiffs

Lauren Gorman, Esq.
275 Hill Street, Ste 248
Reno, NV 89501
lgorman@laurengormanlaw.com
Attorney for Plaintiffs

 X Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices, and addressed as follows:

Tyler Michael Baehr
9752 Pachuca Drive
Reno, NV 89521
In Propria Persona

DATED this 27th day of June, 2025.

/s/ Jenny Sparks

Jenny Sparks
Legal Assistant

Exhibit List

Exhibit No.	Description	# of Pages
1	City of Reno's Supplement to its Motion for Judgment on the Pleadings	17